

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

**IDQ OPERATING, INC.,**

Plaintiff,

**V.**

**AEROSPACE COMMUNICATIONS  
HOLDINGS CO., LTD.,**

Defendant.

**CIVIL ACTION NO. 6:15-CV-781-JRG-KNM**

## JURY TRIAL DEMANDED

**NOTICE OF SPECIAL APPEARANCE FOR DEFENDANT  
AEROSPACE COMMUNICATIONS HOLDINGS CO., LTD.**

Please take notice that the following individual hereby enters a special appearance as counsel of record for Aerospace Communications Holdings Co., Ltd. (“ACH”):

Lionel M. Lavenue  
Virginia Bar No. 49005  
lionel.lavenue@finnegan.com  
**FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, LLP**  
Two Freedom Square  
11955 Freedom Drive  
Reston, VA 20190  
Phone: (571) 203-2700  
Fax: (202) 408-4400

This is a limited appearance only, and it does not allow IDQ to serve counsel for ACH, which would allow IDQ to benefit from the ineffective attempts at service and continued refusal to follow proper procedures for proper service of a foreign company under the Hague Convention.

Dated: November 19, 2015

Respectfully submitted,

/s/ Lionel M. Lavenue

Lionel M. Lavenue  
FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, LLP  
Two Freedom Square  
11955 Freedom Drive  
Reston, VA 20190  
Phone: (571) 203-2700  
Fax: (202) 408-4400

**Counsel for Defendant Aerospace  
Communications Holdings Co., Ltd. (for  
the limited purposes of filing a Motion to  
Quash Service, an extension of time to  
respond to the Complaint, and a Motion  
to Dismiss, among other case  
requirements)**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document, **NOTICE OF SPECIAL APPEARANCE FOR DEFENDANT AEROSPACE COMMUNICATIONS HOLDINGS CO., LTD.**, was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule-CV-5(d), all other counsel of record not deemed to have consented to electronic service will be served with a true and correct copy of the foregoing by email on the 19<sup>th</sup> day of November, 2015.

/s/ Lionel M. Lavenue

Lionel M. Lavenue